

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

October 30, 2019

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

On behalf of the plaintiffs, the Plaintiffs' Executive Committees ("PECs") write to respectfully request a brief extension, to November 8, 2019, for the plaintiffs to submit their responses to discovery motions filed by the Kingdom of Saudi Arabia on October 28, 2019. The Kingdom of Saudi Arabia does not object to this request.

As the Court is aware, the Kingdom filed two discovery motions on Monday evening, within minutes of one another, seeking (1) a protective order relative to supplemental written discovery requests the plaintiffs served upon the Kingdom relating to the third main subject of the FBI's 9/11 sub-file investigations (filed under seal); and (2) proposing a scheduling order for all further subject matter jurisdiction proceedings as to the Kingdom under JASTA (ECF #5235). The plaintiffs need a brief extension of the deadlines for responding to these two motions, for the following reasons.

First, several members of the PECs have previously scheduled travel and business commitments this week, impairing the PECs' ability to confer this week and coordinate the consolidated responses on behalf of the plaintiffs to the two motions.

Second, the plaintiffs' responses to the two motions will require them to address issues relating to the content and sufficiency of the Kingdom's supplemental productions in response to the Court's Orders issued on July 22, 2019, but the translation of those documents remains ongoing. As the Court will recall, Saudi Arabia requested an extension of time to compile its documents in response to those Orders, citing the Hajj and other considerations (ECF #4705). As a result, the Kingdom did not serve its supplemental productions on the PECs until September 25, 2019 and October 4, 2019. Although the PECs immediately sent those productions to their

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translators and are paying to have the translations expedited, the initial translations of those productions will not be complete until November 1, 2019. As a result, the plaintiffs require a brief extension of the deadlines for these motions, to allow the PECs an opportunity to review the translations and address issues relating to the supplemental productions and Saudi Arabia's searches in the responses.

For the foregoing reasons, the plaintiffs respectfully request that the Court grant the plaintiffs a brief extension, to November 8, 2019, to file their responses to the Kingdom's two discovery motions of October 28, 2019.

We thank Your Honor in advance for the Court's consideration of this request.

Respectfully submitted,

COZEN O'CONNOR

/s/ Sean P. Carter

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MDL 1570 Plaintiffs' Exec. Committee for
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MDL 1570 Plaintiffs' Exec. Committee for
Personal Injury and Death Claims

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/s/ Robert T. Haefele

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Personal Injury and Death Claims

cc: The Honorable George B. Daniels (via ECF)
All MDL Counsel of Record (via ECF)